

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ALYSSON MILLS, IN HER CAPACITY
AS RECEIVER FOR ARTHUR LAMAR
ADAMS AND MADISON TIMBER
PROPERTIES, LLC,

Plaintiff,

v.

BUTLER SNOW LLP; BUTLER SNOW
ADVISORY SERVICES, LLC; MATT
THORNTON; BAKER, DONELSON,
BEARMAN, CALDWELL & BERKOWITZ
PC; ALEXANDER SEAWRIGHT, LLC;
BRENT ALEXANDER; and JON
SEAWRIGHT,

Defendants.

Case No. 3:18-cv-00866-CWR-FKB

Hon. Carlton W. Reeves

ORAL ARGUMENT REQUESTED

**BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ PC'S
MOTION TO DISMISS THE AMENDED COMPLAINT**

Baker, Donelson, Bearman, Caldwell & Berkowitz P.C. moves to dismiss the Amended Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The bases for this motion are set forth in the Memorandum of Law filed contemporaneously herewith.

Dated this 20th day of December, 2019

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ PC**

/s/ Michael W. Ulmer

Michael W. Ulmer (MSB #5760)
James J. Croneyer, Jr. (MSB #10536)
WATKINS & EAGER PLLC
400 East Capitol Street, Suite 300 (39201)
Post Office Box 650
Jackson, MS 39205
Tel.: (601) 965-1900

Fax: (601) 965-1901
Email: mulmer@watkinseager.com

Craig D. Singer (*pro hac vice*)
Benjamin W. Graham (*pro hac vice*)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Tel.: (202) 434-5000
Fax: (202) 434-5029
Email: csinger@wc.com

*Counsel for Defendant Baker, Donelson,
Bearman, Caldwell & Berkowitz PC*

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Benjamin W. Graham
Benjamin W. Graham